



United States Attorney
Southern District of New York

50 Main Street, Suite 1100
White Plains, New York 10606

November 22, 2024

BY ECF / EMAIL

The Honorable Cathy Seibel
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Application ~~Granted~~ / Denied
So Ordered.

Cathy Seibel
Cathy Seibel, U.S.D.J.

Dated: 11/25/24

Re: *United States v. Jimmy Abellard*, 20 Cr. 194 (CS)

Dear Judge Seibel:

The Government writes respectfully to request unsealing of the following filings and transcripts in the above-captioned case.

Transcripts to Unseal

1. Transcript of December 23, 2019 Presentment & Bail Hearing
2. Transcript of January 16, 2020 Bail Hearing
3. Transcript of October 15, 2020 Plea Hearing
4. Transcript of February 13, 2023 Plea Hearing
5. Transcript of April 26, 2023 Bail Hearing
6. Transcript of August 28, 2023 Bail Hearing
7. Transcript of September 6, 2023 Bail Hearing

Docket Entries to Unseal

1. Order re: Sentencing Schedule, dated December 23, 2020 (Dkt. No. 23)
2. Takeout Order to Westchester County Jail, dated March 1, 2021 (Dkt. No. 25)
3. Order re: Sentencing Schedule, dated March 26, 2021 (Dkt. No. 26)
4. Order re: Sentencing Schedule, dated May 18, 2021 (Dkt. No. 27)
5. Takeout Order to Westchester County Jail, dated May 24, 2021 (Dkt. No. 28)
6. Order re: Sentencing Schedule, dated August 5, 2021 (Dkt. No. 29)
7. Letter from the Government re: Sentencing Schedule, dated November 23, 2021 (Dkt. No. 30)
8. Letter from the Government re: Sentencing Schedule, dated February 9, 2022 (Dkt. No. 33)
9. Takeout Order to Essex County Correctional Facility, dated February 23, 2022 (Dkt. No. 35)
10. Order re: Sentencing Schedule, dated May 31, 2022 (Dkt. No. 37)
11. Letter from the Government re: Sentencing Schedule, dated August 15, 2022 (Dkt. No. 38)

12. Letter from the Government re: Sentencing Schedule, dated December 9, 2022 (Dkt. No. 39)
13. Superseding Information S1 20 Cr. 194 (CS); and Waiver of Indictment re S1 20 Cr. 194 (CS), dated February 13, 2023 (Dkt. No. 40)

Other Filings & Exhibits to Unseal

1. Cooperation Agreement dated February 1, 2023 (Court Ex. 2, dated February 13, 2023)
2. Letter from the Government regarding Disciplinary Records, dated September 1, 2023
3. Takeout Order to the Metropolitan Detention Center, dated August 19, 2024
4. Letter from the Government regarding 5K1.1 Motion, dated November 15, 2023, as redacted in the attached Exhibit A
5. Letter from the Government regarding Guidelines Calculation, dated November 17, 2024
6. Defendant's sentencing memorandum, dated November 17, 2024, and accompanying attachments, subject to redactions proposed by defense counsel¹
7. Letter from the Government regarding Guidelines Calculation, dated November 18, 2024

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: 

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Benjamin L. Levander
Assistant United States Attorneys
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cc: Sam Braverman, Esq. (via email)

¹ The Government understands that defense counsel will submit proposed redactions for these filings, as needed.